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12 **IN THE UNITED STATES DISTRICT COURT**
13 **FOR THE DISTRICT OF NEVADA**

14 SUZANNE SEKULER,

15 Plaintiff,

16 v.

17 C. R. BARD, INC.; BARD PERIPHERAL
18 VASCULAR, INCORPORATED,

19 Defendants.
20

CASE NO. 2:19-cv-01585-KJD-BNW

21 **STIPULATION AND ORDER TO EXTEND DISCOVERY**
22 **AND PRE-TRIAL DEADLINES**

23 Comes now, Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (“Bard”
24 or “Defendants”) and Plaintiff Suzanne Sekuler (“Plaintiff”), by and through their
25 undersigned counsel of record, pursuant to LR IA 6-2, and hereby stipulate that all existing
26 discovery and pre-trial deadlines are extended by ninety (90) days. This stipulation is entered
27 into as a result of complications and difficulties related to the current national emergency
28 caused by the spread of COVID-19.

For the foregoing reasons, the parties stipulate and request that this Court modify the Stipulated Discovery Plan and Scheduling Order, Dkt. 24, as follows:

PROPOSED DATE	DEADLINE
November 22, 2019	The Parties shall exchange Rule 26(a) Initial Disclosures. The Plaintiff shall produce a list of medical providers for the period of time from ten years before placement of the Bard filter at issue in the case to the present, and shall sign standard medical and other records release authorizations agreed upon by the parties.
November 22, 2019	The Parties shall join other parties and amend the pleadings.
December 6, 2019	Plaintiff shall produce the completed Plaintiff Fact Sheet and related information utilized in the <i>In re: C. R. Bard, Inc. IVC Filter MDL</i> , attached as Exhibit A . The parties agree that the terms incorporated into the Plaintiff Fact Sheet form adopted in MDL 2641 and Federal Rules of Civil Procedure 26, 33, 34, and 37 shall apply to the completion and supplementation of the Plaintiff Fact Sheet. The parties agree that any additional case-specific written discovery such as Interrogatories or Request for Production will be limited and targeted to the specific facts of this case.
January 10, 2020	Defendants shall produce the Defendant's Fact Sheet and related information utilized in the <i>In re: C. R. Bard, Inc. IVC Filter MDL</i> , attached as Exhibit B . The parties agree that the terms incorporated into the Defendant Fact Sheet form adopted in MDL 2641 and Federal Rules of Civil Procedure 26, 33, 34, and 37 shall apply to the completion and supplementation of the Defense Fact Sheet. The parties agree that any additional case-specific written discovery such as Interrogatories or Request for Production will be limited and targeted to the specific facts of this case.
October 8, 2020	Case-specific fact discovery closes.
October 22, 2020	The Plaintiff shall produce case-specific expert reports.
November 26, 2020	The Defendants shall produce case-specific expert reports.
December 17, 2020	The Plaintiff shall produce any case-specific rebuttal expert reports.
January 11, 2021	The Defendants shall produce any rebuttal expert reports.

PROPOSED DATE	DEADLINE
January 25, 2021	Deadline to depose the Plaintiff's case-specific experts about their case-specific reports.
March 1, 2021	Deadline to depose the defendants' case-specific experts about their case-specific reports.
April 12, 2021	Deadline to file Daubert motions and other dispositive motions.

IT IS SO STIPULATED.

Dated this 2nd day of April 2020.
WETHERALL GROUP, LTD.

Dated this 2nd day of April 2020.
GREENBERG TRAURIG, LLP

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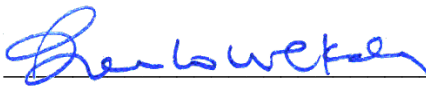
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Counsel for Defendants

IT IS SO ORDERED.



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

Dated this 3rd day of April 2020.

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CERTIFICATE OF SERVICE

I hereby certify that on **April 2, 2020**, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive such service.

/s/ Evelyn Escobar-Gaddi
An employee of GREENBERG TRAURIG, LLP